



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

RESPONSIVENESS SUMMARY TO COMMENTS RECEIVED DURING PUBLIC NOTICE For Proposed Air Quality Control Permit Number 1000155

Transwestern Pipeline Company, Flagstaff Compressor Station

All of the following comments were submitted by El Paso Natural Gas Company for their compressor station permits but are relevant to Transwestern Pipeline Company's (TPC) permit as well.

TABLE 1 : Summary of Permit Requirements

Comment 1: SO_x Monitoring/Recordkeeping for P1, P2, P3 - The "< 0.017 wt% (5gr/scf) should be replaced with "< 0.8 percent by weight" since the sulfur dioxide standard in R18-2-719.J references 0.8 weight percent.

Response: TPC is required under FERC agreement to limit sulfur content in natural gas to less than 5 gr/scf which is equivalent to 0.017 weight percent. Our regulations require TPC to limit the sulfur content to less than 0.8 weight percent. FERC stipulated 0.017% was specified as a reference. This has been removed to make the table consistent with the statements in permit conditions II.A.1 and II.B.1 of Attachment "B". The table has been updated to reflect this change.

Comment 2: NO_x, CO, VOC, HAPs Testing frequency/Methods: The language should be revised to state as follows:

"One time for NO_x and CO on each turbine within six months of permit expiration if engine unit operated for 15 cumulative days using Method 20 and 10."

Response: ADEQ agrees with EPNG. The above language has been added to the permit.

Comment 3: Opacity: The table should include exemption for the first 10 minutes after cold starting as noted in R18-2-719.E.

Response: ADEQ agrees with EPNG. The exemption for the first 10 minutes after cold starting has been added to the table.

ATTACHMENT A

Comment 7: II. Compliance with permit conditions:

A. The first sentence of this provision should be reworded to conform to the permit shield provisions of R18-2-325:

The Permittee shall comply with all conditions of this permit, which sets forth all applicable requirements of Arizona's air quality statutes and the air quality rules.

The existing language could be read as requiring the Permittee to comply with "all applicable requirements" which contradicts the purpose of a Class I permit.

Response: ADEQ agrees with EPNG. This change has been made in the permit condition.

Comment 9: XVII. Testing Requirements

EPNG understands that normal rated capacity means capacity reflecting ambient temperature, pressure and humidity conditions present during the emissions test. EPNG also understands that ADEQ's inclusion of the provision allowing for performance testing at lower operational rates with the Director's prior written approval acknowledges that at certain times there may be insufficient natural gas throughput to operate at "normal rated capacity" in which case testing may be deferred or conducted at a lower operating rate. While EPNG would prefer that ADEQ include permit language defining normal rated capacity as capacity reflecting ambient conditions and available pipeline capacity, EPNG is willing to accept ADEQ's explanation of its intent in the Technical Review Document and response to these comments.

Response: ADEQ is aware that EPNG may or may not operate the turbine(s) at their normal rated capacity, during the life of the permit. Given the unpredictability in operations, it was decided that the optimal course of action would be to obtain written approval from the Director at the time of testing, if the testing is to be performed at a lower rate. This comment does not result in a change in the permit language.

ATTACHMENT B

Comment 10: I. Emission Limitations (I.B.1.b.3)

EPNG understands that dust suppressants or wetting agents are to be used during construction operations, repair operations, and demolition activities directly associated with earth moving or excavation activities likely to generate excessive amounts of particulate matter and not for any construction operation, repair

operation, or demolition activity. EPNG requests ADEQ clarification if this is not ADEQ's intent.

Response: The intent of condition I.B.1.b.3 of Attachment “B” of the permit is to regulate excessive emissions of particulate matter. The intent of this condition is further clarified by the wording of condition I.B.1.b which is as follows: “Permittee shall employ the following methods to *prevent excessive amounts of particulate matter from becoming airborne*.”. Those construction, repair, or demolition operations that have no associated particulate matter emissions are not subject to the requirements of condition I.B.1.b.3 of Attachment “B” of the permit. This comment does not result in a change in the permit language.

Comment 13: Monitoring and Recordkeeping (II.A.1)

EPNG understands that we need to maintain an updated copy of the extracted portion of the FERC approved tariff which pertains to the sulfur content and lower heating value of the fuel and not the entire FERC tariff which is a voluminous and periodically edited document. EPNG requests ADEQ clarification if this is not ADEQ's intent.

Response: The intent of condition II.A.1 of Attachment “B” of the permit is to monitor particulate and sulfur dioxide emission standards only. The language has been modified to further clarify that tariff information relating only to lower heating value and fuel sulfur content needs to be kept on file. The modified language is reproduced below:

Permittee shall monitor daily, the sulfur content and lower heating value of the fuel being combusted in the gas turbine. This requirement may be complied with by maintaining a copy of that part of the Federal Energy Regulatory Commission (FERC) approved Tariff agreement that limits transmission to pipeline quality natural gas of sulfur content less than 0.8 percent by weight and having a heating value greater than or equal to 967 Btu/ft³.

Comment 14: Monitoring and Recordkeeping (II.B.1)

For a more streamlined permit, EPNG suggests that ADEQ consider combining the identical provisions of II.B.1.c through II.B.1.i. EPNG proposes

- c. Dates on which any of the activities listed in I.B.1.b.(3) through (9) were performed, and control measured adopted.

Response: The current format of condition II.B.1 of Attachment “B” of the permit will be retained since it enhances the readability of the permit.

Comment 20: Testing Requirements (IV.A)

EPNG agrees with the Technical Review Document that there are no emission limits or standards for NOx and CO for the reciprocating units at the facility. EPNG does not believe that R18-2-719 or any other applicable requirement establishes NOx and CO emission standards applicable to the units. Although EPNG believes there is no basis for NOx and CO testing requirements, EPNG does, however, understand ADEQ's intent in providing corroborating data to supplement the existing emissions estimates. By agreeing to this one-time test, EPNG is not conceding that any such testing is required.

At some EPNG locations, there is a high pressure pipeline system and low pressure pipeline system that is distinct and each system is connected to only one particular turbine unit. Therefore, if there is no means of routing the natural gas between the systems, one unit may operate while the other may not. Since the intent of the requirement is to mandate testing of a particular unit, the fifteen cumulative days should be unit specific rather than location specific.

The requirement to conduct a performance test if the cumulative days of operation of all engines during the permit term exceed fifteen days should be changed to read as follows:

Permittee shall conduct one performance test on a turbine if the cumulative days of operation of the unit during the permit term exceed fifteen days.

If the language cannot be changed to be unit specific, EPNG requests the flexibility to petition ADEQ for a reprieve from performance testing if it can be shown that the individual unit operated for less than fifteen days during the permit term. EPNG requests in the testing section that "These performance tests shall be completed within six months prior to this permit expiration." be changed to "These performance tests shall be completed within six months prior to this permit expiration. If the unit cannot be tested within six months prior to the permit expiration, Permittee shall provide records showing the unit operated less than fifteen cumulative days of operation and any other supporting data to petition the Director for a reprieve from the performance testing requirement." Excusing testing for units that have not operated fifteen days, even when another unit on a different line at the same facility may have operated over fifteen days, does not represent a weakening of testing requirements. As EPNG has mentioned elsewhere and ADEQ has conceded, at many EPNG facilities, there is no applicable requirement mandating testing. Although ADEQ indicated verbally that flexibility would be given at those unique locations, it would be preferable to include the optional language in the permits.

Response: ADEQ agrees with EPNG and recognizes the physical limitations imposed by the high pressure and low pressure pipeline systems. The language of IV.A has been modified as follows:

"Permittee shall conduct one performance test on a turbine if the cumulative days of operation of the unit during the permit term exceed fifteen days. These performance tests shall be completed within six months prior to this permit expiration. Each set of performance tests shall include all of the pollutants listed in Section IV.B of this Attachment."